

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

SHANE HARDYMON,)	CASE NO.: 1:22-CV-00724-SO
)	
Plaintiff,)	JUDGE SOLOMON OLIVER, JR.
vs.)	
)	<u>REPORT OF PARTIES PLANNING</u>
SHERIFF SCOTT M. KENT, et al.,)	<u>MEETING UNDER FED. R. CIV. P. 26(f)</u>
)	<u>AND LR 16.3(b)(3)</u>
Defendants.)	
)	

1. Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.3(b), a meeting was held on August 26, 2022 and was attended by:

Rebecca J. Sremack	Counsel for Plaintiff(s):	Shane Hardymon
Billi F. Copeland	Counsel for Plaintiff(s):	Shane Hardymon
Stephanie Schoolcraft	Counsel for Defendant(s):	Sheriff Scott M. Kent; the Board of Commissioners of Crawford County, Ohio / Crawford County, Ohio; Sergeant Tyson Estrada; Deputy Brandon M.A. Cottrill; Deputy Cory J. Geyer; Deputy Daniel J. Williamson, and Administrator Kent Rachel
Helen Sudhoff	Counsel for Defendant(s):	Sheriff Scott M. Kent; the Board of Commissioners of Crawford County, Ohio / Crawford County, Ohio; Sergeant Tyson Estrada; Deputy Brandon M.A. Cottrill; Deputy Cory J. Geyer; Deputy Daniel J. Williamson, and Administrator Kent Rachel

2. The parties:

- ☒ will exchange such disclosures by October 15, 2022
- ☐ have exchanged the pre-discovery disclosures required by Fed. R. Civ. P 26(a)(1)

and the Court's prior order;

3. The parties recommend the following track:

- ☐ Expedited ☒ Standard ☐ Complex
- ☐ Administrative ☐ Mass Tort

4. This case is suitable for one or more of the following Alternative Dispute Resolution (“ADR”) mechanisms:

- ☐ Early Neutral Evaluation
☐ Mediation
☐ Arbitration
☐ Summary Jury Trial
☐ Summary Bench
☒ Case not suitable for ADR at this time.

5. The parties ☐ do/ ☒ do not consent to the jurisdiction of a United States Magistrate Judge pursuant to 28 U.S.C. § 636(c).

6. Recommended Discovery Plan:

(a) Describe the subjects on which discovery is to be sought and the nature and extent of discovery.

Plaintiffs intend to discover video evidence, personnel history and any records including standard policies and procedures via Interrogatories, Requests for Production of Documents and depositions concerning liability and defenses as well as damages.

Defendants intend to discover records relating to the allegations in Plaintiff’s complaint, Plaintiff’s past and present medical conditions, his personal and professional background, criminal history, and any records relating to the damages alleged.

(b) Discovery cut-off date: August 1, 2023

7. Recommended dispositive motion date: October 1, 2023

8. Recommended cut-off for amending the pleadings and/or adding additional parties:
November 1, 2022

9. Recommended date for a Status Hearing: December 1, 2022

10. Other matters for the attention of the Court: Recommended date for initial expert reports:
May 1, 2023. Recommended date for rebuttal expert reports: June 1, 2023.

/s/ Rebecca J. Sremack
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Counsel for Plaintiff

/s/ Billi F. Copeland
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Counsel for Plaintiff

s/ Stephanie L. Schoolcraft
Attorney for Defendant(s) Sheriff Scott M.
Kent, The Board of Commissioners of
Crawford County, Ohio/Crawford County,
Ohio, Sergeant Tyson Estrada, Deputy
Brandon M. A. Cottrill, Deputy Cory J. Geyer,
Deputy Daniel J. Williamson, and
Administrator Kent Rachel.
Bar # 0090682

s/ Helen K. Sudhoff
Attorney for Defendant(s) Sheriff Scott M.
Kent, The Board of Commissioners of
Crawford County, Ohio/Crawford County,
Ohio, Sergeant Tyson Estrada, Deputy
Brandon M. A. Cottrill, Deputy Cory J.
Geyer, Deputy Daniel J. Williamson, and
Administrator Kent Rachel.
Bar # 0101259

CERTIFICATE OF SERVICE

I hereby certify that on August 26, 2022, a copy of the foregoing Report of Parties Planning Meeting Under Fed. R. Civ. P. 26(f) and Local Rule 16.3(b) was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

s/Billi F. Copeland

BILLI F. COPELAND (0083422)

Counsel for Plaintiff Shane Hardyman